

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	No. 98 CR 434
)	Hon. Milton I. Shadur
NASIM NAKIGOZI, et al.)	

GOVERNMENT'S PROPOSED EXHIBIT LIST

Subject to additional guilty pleas, stipulations and changes made during the course of the trial, the government expects to introduce the following exhibits at trial:

Narcotics

9/30/98 Seizure
10/2/98 Seizure 1
10/2/98 Seizure 2
5/29/98 Seizure
6/11/98 Seizure
6/17/98 Seizure

Tapes and Transcripts

Tape #1 and Transcript #1 (9/30 at 11:22 pm)
Tape #2 and Transcript #2 (10/1 at 7:30 am)
Tape #3 and Transcript #3 (10/1 at 7:40 am)
Tape #4 and Transcript #4 (10/1 at 8:20 am)
Tape #5 and Transcript #5 (10/1 at 9:13 am)
Tape #6 and Transcript #6 (10/1 at 9:27 am)
Tape #7 and Transcript #7 (10/1 at 10:05 am)
Tape #8 and Transcript #8 (10/1 at 10:32 am)
Tape #9 and Transcript #9 (10/1 at 10:37 am)
Tape #10 and Transcript #10 (10/1 at 2:50 pm)
Tape #11 and Transcript #11 (10/1 at 6:20 pm)
Tape #12 and Transcript #12 (10/1 at 6:44 pm)
Tape #13 (6/16 at 12:39 pm)
Tape #14 and Transcript #14 (6/17 at 2:25 pm)
Tape #15 and Transcript #15 (6/17 at 2:35 pm)
Tape #16 and Transcript #16 (6/17 at 3:00 pm)

Videotape #1

Exhibit A
2241

Photos

Sleep Inn Room 1
Sleep Inn Room 2
Sleep Inn Room 3
5200 Blackstone 1
5200 Blackstone 2
5200 Blackstone 3
Black Residence 1
Black Residence 2
Black Residence 3
Black Residence 4
Black Residence 5
Maplewood Photo 1
Maplewood Photo 2
Maplewood Group Photos
Togun Shoes
Nakigozi Pellets
Car Photo

Items

Sleep Inn Items
 Ex-lax
 Glad bag
 Utility knives
 Flower Bag
Maplewood Scale
Black Bag
Letter 1
Letter 2
Phone 1 (Foster)
Phone 2 (Kingsley)
Phone 3 (Obayemi)
Gun and Ammunition
Togun Shoes

Documents

Sleep Inn Documents
Blackstone Documents
Maplewood Receipts
Maplewood Lease
Krause Identification
Oreye Identification
Togun Customs Declaration
Egelle Customs Declaration
Oloduro Customs Declaration

Nakigozi Group Exhibit

Car Documents

Ganzer Photospread
DesRosier Photospread


Ganzer Records
Taylor Records


Ameritech Cellular Records 1
Ameritech Cellular Records 2
Ameritech Cellular Records 3
Ameritech Cellular Records 4
Ameritech Cellular Records 5
Ameritech Landline Records 1
Ameritech Landline Records 2
Prime Co. Records
Sleep Inn Records
Chicago Lodge Records
Phone Summary Chart

Respectfully submitted,

SCOTT R. LASSAR
United States Attorney

By:


PATRICK M. COLLINS
Asst. United States Attorney


THEODORE T. CHUNG
Asst. United States Attorney

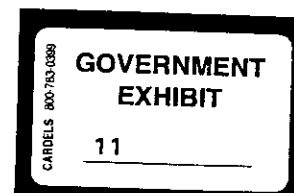
DATE: October 1, 1998
TIME: 6:20PM
ACTIVITY: Telephone call from #312-360-9698 to #773-390-2394
LOCATION: 610 S. Canal Street, Chicago, Illinois
GOV'T
EXHIBIT: Transcript #11

SPEAKERS:

FOSTER: Emmanuel Foster aka Akee
BLACK: Michael Black aka Mohammed
UM: Unknown male individual

* * * * *

1 UM: Hello
2 FOSTER: Asalaam Alaikun
3
4 UM: Alaikun Asalaam
5
6 FOSTER: Yeah
7
8 UM: Who is speaking?
FOSTER: Ehm... tell him Danuel
10 UM: Hold.
11 BLACK: Hello.
12 FOSTER: Hello.
13 BLACK: Yeah.
14 FOSTER: Yeah, you know what?
15 BLACK: Yeah.
16 FOSTER: My guy, my guy wants some ...wants some, uh, some
uh what do you call it, some money for the stuff
before I bring it.
17 BLACK: Alright, I already know. I'm working on it, don't
worry.
18 FOSTER: Oh, you're working on it?



1 BLACK: You damn right I am.

2 FOSTER: Like how much could I get for him?

3 BLACK: Uh..I'm waiting, man, one guy come in and I'll have
the rest of this tonight.

4 FOSTER: You don't know like how much? Just give me an idea
so I could tell him before, I mean.. the guy's kind
of behaving funny or something.

5 BLACK: Uhm..Like to say fourteen (14) to fifteen (15).
Wait.

6 FOSTER: Yeah?

7 BLACK: And yet I may have twenty (20) I don't know. It
depends on who comes through man.

8 FOSTER: Okay then, I'll call you back and let you know.

9 BLACK: I'll call you as soon as I got the money.

10 FOSTER: Okay, you'll call me, yeah?

11 BLACK: Yeah, as soon as I get the money.

FOSTER: Alright then.

13 BLACK: Alright.

14 FOSTER: Alright.

END OF CONVERSATION

uh... I have to be... It's going be a while before I
come to see, because I have to clean... I have to
clean everything up.

28

29 BLACK: Uh, okay. Clean everything up?

30

31 FOSTER: Yeah.

32

33 BLACK: Oh, oh, oh, on the other thing right?

34

35 FOSTER: Yeah.

36

37 BLACK: Okay, well just give me a little time today then.

38

39 FOSTER: Okay.

40

41 BLACK: Okay on the other thing, right?

42

43 FOSTER: What?

44

45 BLACK: You said you got to clear everything from the other...
on the old thing, right?

46

47 FOSTER: Yeah.

48

49 BLACK: Okay, just give me a minute then.

50

FOSTER: Okay, then.

52

53 BLACK: Alright.

54

FOSTER: Alright.

END OF CONVERSATION

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v.

NASIM NAKIGOZI, et al.

)
)
)
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No. 98 CR 434

Judge Milton I. Shadur

V E R D I C T

We, the jury, find the defendant, MICHAEL BLACK, GUILTY, as charged in the Indictment.

FOREPERSON

(Date)

Exhibit B
BLACKS 2241

You have heard recorded conversations. These recorded conversations are proper evidence and you may consider them, just as any other evidence.

When the recordings were played during the trial, you were furnished transcripts of the recorded conversations prepared by government agents[/witnesses].

The recordings are the evidence, and the transcripts were provided to you only as a guide to help you follow as you listen to the recordings. The transcripts are not evidence of what was actually said or who said it. It is up to you to decide whether the transcripts correctly reflect what was said and who said it. If you noticed any difference between what you heard on the recordings and what you read in the transcripts, you must rely on what you heard, not what you read. And if after careful listening, you could not hear or understand certain parts of the recordings, you must ignore the transcripts as far as those parts are concerned.

I am providing you with the recordings and a player. You are not required to play the tapes, in part or in whole. You may rely, instead, on your recollections of these recordings as you heard them at trial. If you do decide to listen to a tape recording and wish to have the transcript corresponding to that recording, ask the Marshal in writing and the transcript will be given to you. You may choose to listen to the cassette without the transcript.

GOVERNMENT INSTRUCTION NO. 20

Seventh Circuit Committee (1998) 3.17

Among the exhibits admitted during the trial were recordings that contained conversations in the Yoruba and Pidgin English languages. You were also provided with English transcripts of those conversations. The transcripts were provided to you by the government so that you could consider the content of the conversations on the recordings.

Whether a transcript is an accurate translation, in whole or in part, is for you to decide. In considering whether a transcript accurately describes the meaning of a conversation, you should consider the testimony presented to you regarding how, and by whom, the transcript was made. You may consider the knowledge, training, and experience of the translator, as well as the nature of the conversation and the reasonableness of the translation in light of all the evidence in the case. You should not rely in any way on any knowledge you may have of the language spoken on the recording; your consideration of the transcripts should be based on the evidence introduced in the trial.

GOVERNMENT INSTRUCTION NO. 21

Seventh Circuit Committee (1998) 3.18

Emmanuel Foster,

#10233-424,

M.C.C. CHICAGO,

08/24/99.

Dear Sir,

Mr Hal, Garfunkel,
111 W. Washington,
CH. IL. 60606.

I am one of co-defender of your
Client, Mr M. Black.
Which I will like to set some few things
straight.

Firstly, I like to make sure that
there is no problem between me and your
Client.

Secondly, The whole thing was started
by Okorre Egelle and he mentioned your
Client name, and by the time I got to
the Hotel, which I have no other
choice but to co-operate with agent.
The idea of the phone call was brought
up by the agent.

And everything I say was written down by
agent, I ~~wasn't~~ wasn't sure who I was
speaking to on the phone either.
And I explain everything in my profile.

I will greatly appreciate if you carefully
look into this matter please.



Thank you for your Co-operation and
looking forward to hear from you.

faithfully
E Foster

Exhibit
#C
2082

08-20-00

Dear Mrs Angela Black,

It my sincere hope
that you and your children are safe and fine
and your husband is in good condition, say hi
to him next time you speak or when you are
near, and what happen was not any thing
personal against him, it just that
I was under a lot of pressure at that
time, and I made the wrong decision
at that time, and most of those shots, I did
not say it and it was made up but the
FBI Agents And I did write your husband
lawyer explaining thing to him, and
what I told the judge, the time, is that
I have never did any business or
delivered any drug to him before, and
Mr black and his lawyer should go
check all the Court Docket sheet, before
my sentence and after sentence.
And I am mad because Mr black
think I mention his name, I didn't.
The guy did but I was a fool
to fell for those shots and I have
explain everything before to the lawyer
before, so he should check all over
again with female lawyer and with
the Court and his other lawyer

Exhibit
C

And I am in a bad shape Myself, I don't
 plans all this, My Mother need me and my father
 is very ill, he already lost his right leg,
 so it's not just you guys that is going
 through suffering, we just have to
 pray that everything work out for the
 best.

Like what I have been saying, What's it
 that you black want me to do for him,
 and so I can know, and I will decide
 what to do from there, but now you
 did it mentions anything in your faith
 you want me to do.

And tell him that everything happen like
 that because most of my guys were
 stupid, and foolish, include me, I am
 just sorry that we put him in trouble
 like that.

I stop for now, God bless you and your
 husband and your two sisters.

Looking forward to hear from you!

Thank
 Emmanuel